

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
	:	
	:	
Craig Bradley Deimler	:	
William Oliver Fisher-Deimler	:	CASE NO: 1:20-bk-00841-HWV
	:	
	:	
Debtors	:	

MOTION TO MODIFY CONFIRMED CHAPTER 13 PLAN

NOW COME Debtors, Craig Bradley Deimler and William Oliver Fisher-Deimler (“Debtors”), by and through their counsel, John M. Hyams, and respectfully request that this Honorable Court approve a modification of their confirmed Chapter 13 Plan, and as reasons therefor states as follows:

1. Debtors filed their Voluntary Petition in Chapter 13 Bankruptcy on March 4, 2020.
2. Debtors’ Chapter 13 Plan was confirmed on March 24, 2021 (the “Confirmed Plan”).
3. Debtors’ have entered into a stipulation with M&T Bank to cure their mortgage arears.
4. Debtors hereby file this Motion to Modify their Chapter 13 Plan for the remaining life of the Chapter 13 Plan. Debtors hereby request such modification, in accordance with Section 1329(a) of the Bankruptcy Code.

5. Debtors' proposed Fourth Amended Chapter 13 Plan is attached hereto as Exhibit "A".

WHEREFORE, Debtors request that this Honorable Court grant Debtors leave to modify their Confirmed Chapter 13 Plan in accordance with the revised provisions herein.

LAW OFFICES OF JOHN M. HYAMS

Dated: September 27, 2022

By: /s/ John M. Hyams
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